

EXHIBIT K

THE STATE OF NEW HAMPSHIRE
SUPERIOR COURT, CHESHIRE COUNTY

THE STATE OF NEW HAMPSHIRE

– against –

GORDON MacRAE

DOCKET #: #93-S-0218-0228
1076-1078
1229-1231
1554-1557

AFFIDAVIT OF JAMES ABBOTT

James Abbott, being duly sworn, affirms as follows:

1. I am a licensed private investigator, retained to conduct an investigation on behalf of Defendant-Petitioner, Gordon MacRae in the above encaptioned matter.
2. The following are relevant components of my educational and professional history:
Since 2005, I have worked as a Private Investigator. Prior to that, I was Director of Security at Brookhaven National Laboratory, from 2004-2005.

From 1998 through 2004, I served as Deputy Commissioner of the Suffolk County, New York Police Department. From 1971 through 1998, I served in the FBI in Units including, Fugitive and Highjacking Investigations, Organized Crime and Extortion, Political Corruption and Labor Racketeering, Major Organized Crime, JFK Airport Senior Agent Directing Investigations, National Security Initiatives/Anti-Terrorism, Undercover and Sensitive Operations. I also served in the New York City Police Department from 1965-1971.

I am an Adjunct Lecturer at St. John's University in Queens, New York, and a guest lecturer at the FBI Academy and National Security Agency.

I have a BA from Iona College (1965) and a Masters Degree from Long Island University (1974). I have also attended the FBI Police Instructors School (1975), as well as Special Weapons and Tactics School--101st Airborne School Us Army (1974)

3. As part of my investigation in this case, I interviewed several people, including, among others, complainant Thomas Grover's family members, friends, former therapist, and a former substance abuse counselor.
4. Some of these people, on some occasions, provided me with hand- or type-written statements concerning Grover, his admissions that he invented accusations against MacRae in order to extract money from the church, his history and reputation as a liar, and certain of his behavior that undermines the credibility of his claims of abuse. On other occasions, I took notes during my conversation with these people, recording their comments and reports.
5. The following is my sworn statement attesting to the veracity of statements included in my reports and, in turn, in MacRae's motion.

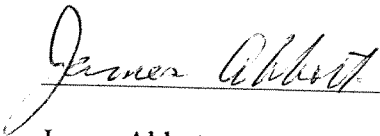
6. I interviewed Tom Grover's former wife, Trina Ghedoni, on April 23, 2008, January 30, 2009, March 11, 2009, March 12, 2009, July 28, 2009, and August 13, 2009. During our conversations, Ms. Ghedoni made the following statements and informed me of the following information that is included in my reports:
 - a. Tom Grover is a "compulsive liar," "manipulator, and a "drama queen" who "molded stories to fit his needs, [and], lied to get what he wanted." He is someone also who "can tell a lie and stick to it 'til its end." (Exh G; Exh. N)
 - b. When confronted with his lies, Grover would lose his temper and "sign himself into the psychiatric unit in Elliott Hospital." (Exh G; Exh. X)
 - c. In 1994, Grover asked Ghedoni to marry him "because it would look better and, more importantly, he needed the security of a wife for the trial." During the entire time he and Ghedoni were together, "never once did [Grover] say he was abused by MacRae." Exh. G
 - d. While she and Grover lived together in the early 1990's, Grover was arrested for resisting arrest and assault on an officer after breaking Ghedoni's nose. (Exh. J)
 - e. Once Grover received his payment from the church, he never returned to see Goupil or any therapist. (Exh. Q)

- f. Grover photographed himself with \$30,000 in cash and took the money around to show friends and relatives, and photograph them with it. (Exh. X; Exh. E)
 - g. In August of 1997, Grover and Ghedoni moved to Arizona. Grover spent all the money on alcohol, drugs, cars, gambling, pornography, and motel rooms. He lost about \$70,000 in one three-day gambling spree. Ghedoni left him in March of 1998, when she found him in bed with his biological sister. (Exh. G; Exh. X)
 - h. Grover's appearance on the witness stand was influenced by Goupil, who coached him along the way. (Exh. X)
- 7. I interviewed Tom Grover's former drug and alcohol abuse counselor, Debra Collett, on August 27, 2009. During our conversation, Ms. Collett made the following statements and informed me of the following information that is included in my reports:
 - a. Grover claimed to have been molested "by so many disparate people that his credibility in the program was seriously in doubt." (Exh. D)
 - b. "Among others" Grover claimed to have been molested by a foster father, a clergyman, and babysitters. (Exh. D)
 - c. Grover claimed to have been molested by so many people that there was concern that "he was going for some kind of sexual abuse victim world record." (Exh. D)

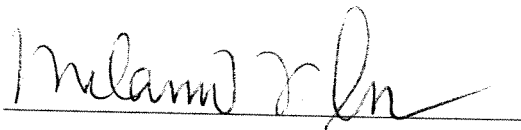
- d. Police officers McLaughlin and Clark tape recorded their interrogation of Collett. She disputed their representation of that session and repeatedly requested a copy of the tape. Her requests were ignored and denied. (**Exh. D)
- 8. I interviewed Tom Grover's friend, Steven Wollschlager, on August 28, 2008, September 24, 2008, and October 27, 2008. During our conversations, Mr. Wollschlager made the following statements and informed me of the following information that is included in my reports:
 - a. In the early 1990s, all the kids in Keene, New Hampshire bragged about how easy it was to set the priests and the church up for money over sexual abuse charges. All the kids were aware that the church was giving out large sums of money to keep the accusations from becoming public and this fed the imagination of the local kids to join in these allegations. (Exh. T)
 - b. Wollschlager reviewed a report written by detective McLaughlin that purportedly included things Wollschlager said to the detective. Wollschlager found the report to be full of untruths. For example, McLaughlin's version had Wollschlager attending high school in the wrong town, making late night collect phone calls to MacRae (though they lived in the same town), and sleeping in the rectory. McLaughlin also attributed to Wollschlager a comment that MacRae did not molest him because Wollschlager was not attractive enough. Wollschlager did not say any of that, and none of it is true. (Exh. R)

- c. Wollschlager reported also: "I could not bring myself to give perjured testimony against [MacRae], who had only tried to help me." Wollschlager told the county attorney, "I know what this is about and I don't want to be part of it." Without comment or question, he was told he was not needed. (**Exh. R)
- 9. I interviewed Tom Grover's step daughter, Tineesha Glenn, on March 12, 2008. During our conversation, Ms. Glenn made the following statements and informed me of the following information that is included in my reports:
 - a. Grover was a "creep," a "pervert" and was "constantly eying" and groping, fondling Tineesha's breasts. (Exh. Z)
 - b. One night Tineesha and her sister Shalina woke to find Grover in their room, sitting in a chair, between their beds, and staring at them. (**Exh. Z)
 - c. Tineesha was afraid of Grover. (Exh. Z)
- 10. I interviewed Tom Grover's step daughter, Shalina Glenn, on March 12, 2008. During our conversation, Ms. Glenn made the following statements and informed me of the following information that is included in my reports:
 - a. Grover was obsessed with teenage girls. She was always "nervous in his presence." (Exh. AA)

11. During the entirety of my three-year investigation of this matter, I discovered no evidence of MacRae having committed the crimes charged, or any other crimes. Indeed, the only thing pointing to any improper behavior by MacRae were Grover's stories – that were undermined by the people who surrounded him at the time he made his accusations and the trial.


James Abbott

Sworn to me this ²⁴ ~~22~~ day of ~~November~~ ^{DECEMBER}, 2011



Notary Public

MELANIE V. BROWN
Notary Public, State of New York
No. 4908712
Qualified in Suffolk County
Commission Expires Oct. 19, 2013